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**NATIONAL RECOVERIES, INC.**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

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JONNAH GARCIA,

Plaintiff,

v.

NAVIENT SOLUTIONS, LLC, a foreign limited-liability company; NATIONAL RECOVERIES, INC., a foreign corporation; EQUIFAX INFORMATION SERVICES, LLC, a foreign limited-liability company; EXPERIAN INFORMATION SOLUTIONS, INC., a foreign corporation; TRANS UNION LLC, a foreign limited-liability company;

Defendants.

CASE NO. 2:18-cv-02311-RFB-VCF

**STIPULATION TO CONTINUE  
DISCOVERY CUTOFF  
(First Request)**

IT IS HEREBY STIPULATED between Plaintiff JONNAH GARCIA (“Plaintiff”) and Defendant NATIONAL RECOVERIES, INC. (“Defendant”), through their respective counsel, as follows:

WHEREAS, on February 8, 2019, a Proposed Discovery Plan and Scheduling Order pursuant to stipulation of the parties (see ECF No. 18);

WHEREAS, the currently set dates and deadlines are as follows:

June 26, 2019: Close of discovery

WHEREAS, Plaintiff noticed the Deposition of Defendant, for June 17, 2019 and Defendant has noticed the deposition of Plaintiff for June 25, 2019.

WHEREAS, the June 17, 2019 deposition date did not work for Defendant, given the unavailability of counsel for Defendant.

WHEREAS, the following is a summary of the discovery completed and to be completed:

- (a) Discovery completed: Plaintiff has propounded and Defendant has responded to written discovery requests.
- (b) Discovery that remains to be completed: depositions of Plaintiff and Defendant.
- (c) The parties have been working to try to resolve the case. Plaintiff and Defendant have each noticed the depositions for completion before the discovery cutoff; however, an unanticipated scheduling conflict will prevent the depositions from being completed before the discovery cutoff.
- (d) The parties propose that the discovery cutoff be continued through and until August 1, 2019 for the limited purpose of completing the depositions of Plaintiff and Defendant.

Based on the foregoing it is stipulated and agreed that the June 26, 2019 discovery cutoff be continued to August 1, 2019 for the limited purpose of completing the depositions of Plaintiff and Defendant. This is the first stipulation for extension of discovery deadlines in this case.

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1 A [Proposed] Order regarding this stipulation is submitted concurrently herewith for the  
2 Court's consideration.

3 IT IS SO STIPULATED.

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5 DATED: June 13, 2019

ALVERSON, TAYLOR & SANDERS

6  
7 By: s/Trevor R. Waite  
8 Trevor R. Waite  
9 Attorney for Defendant  
10 National Recoveries, Inc.

11 DATED: June 13, 2019

LAW OFFICE OF KEVIN L. HERNANDEZ


12 By: s/Kevin L. Hernandez  
13 Kevin L. Hernandez  
14 Attorneys for Plaintiff  
15 Jonnah Garcia

16 **ORDER**

17 The Court, having reviewed the STIPULATION TO CONTINUE DISCOVERY CUTOFF  
18 (First Request), good cause appearing, orders as follows:

19 The June 26, 2019 discovery cutoff is continued to August 1, 2019 for the limited purpose of  
20 completing the depositions of Plaintiff and Defendant.

21 Dated this 13th day of June, 2019.



22 UNITED STATES MAGISTRATE JUDGE

23 Discovery during this extension is limited to the deposition of  
24 Plaintiff and a Fed. R. Civ. P. 30(b)(6) designee of National  
25 Recoveries, Inc.

26 Dispositive motions must be filed on or before September 3, 2019.  
27 The Joint Pretrial Order must be filed by October 3, 2019. If  
28 dispositive motions are filed, the deadline for filing the joint  
pretrial order will be suspended until 30 days after  
decision on the dispositive motions or further court order.